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October 31, 2013

By Fax Number 212.805.7986

Honorable Paul G. Gardephe  
United States District Judge  
United States District Court  
Southern District of New York  
United States Courthouse  
40 Foley Square  
New York, New York 10007

Re: United States v. Martoma, 12 Cr. 973 (PGG)

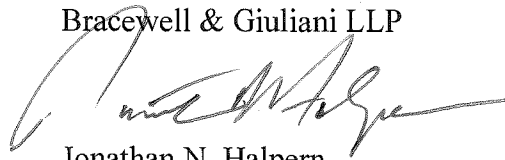
Dear Judge Gardephe:

We respectfully submit this letter to the Court on behalf of Sidney Gilman, M.D., third-party intervenor, in the above-referenced action.

Last night we received a seven-page letter from defendant Martoma's counsel (Dkt. No. 90) regarding Mr. Martoma's motion to compel and Dr. Gilman's motion for a protective order following the University of Michigan's production of documents on October 24, 2013, pursuant to the Court's Order, dated September 24, 2013 (Dkt. No.75). We continue to review the University's production (containing approximately 2,362 pages of documents) and respectfully respect the opportunity until one week from today, November 7, 2013, to submit a response to the Court on behalf of Dr. Gilman.

Respectfully submitted,

Bracewell & Giuliani LLP



Jonathan N. Halpern

cc: Arlo Devlin-Brown, Esq.  
Richard M. Strassberg, Esq.  
Roberto M. Braceras, Esq.  
(by email)